

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

| | | |
|--------------------------------------|---|------------------|
| In re: |) | |
| |) | Bankruptcy Case |
| EAGLE PROPERTIES AND INVESTMENTS LLC |) | No. 23-10566-KHK |
| |) | Chapter 7 |
| |) | |
| Debtor. |) | |

TRUSTEE’S APPLICATION TO EMPLOY ACCOUNTANT

COMES NOW, H. Jason Gold, the Chapter 7 Trustee (the “Trustee”) for Eagle Properties and Investments LLC files this Application to Employ Accountant to the Trustee pursuant to 11 U.S.C. § 327, and states to the Court as follows:

1. April 6, 2023, Eagle Properties and Investments LLC (the “Debtor”) filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code (the “Bankruptcy Code”) and was converted to the Chapter 7 on March 21, 2024. H. Jason Gold is the duly qualified and acting Trustee herein.

2. The Trustee wishes to employ Barry Strickland and Company, Certified Public Accountants (“Barry Strickland & Company”) as accountant to the Trustee, effective March 23, 2024, to perform various accounting duties that are needed for the proper administration of the bankruptcy estate.

3. In connection with the above, Barry Strickland & Company will provide services to the Trustee with respect to accounting work necessary for the proper administration of the Debtor’s bankruptcy estate, including, but not limited to, the preparation and filing of local, state and federal tax returns, reviewing financial records and advising the Trustee, as directed by the Trustee. The Trustee recognizes that parties in interest, including the United States Trustee,

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reserve their rights with respect to any potential objection to any application for compensation filed in connection with this application.

4. The Trustee proposes to employ Barry Strickland & Company at the firm's customary hourly rates for comparable services. The firm's current standard hourly rates for accountants are between \$335.00 and \$350.00 and the firm's current standard hourly rates for paraprofessionals are between \$100.00 and \$140.00. In addition, Barry Strickland & Company will seek reimbursement for necessary and proper expenses incurred in performing the services required by the Trustee.

5. To the best of the Trustee's knowledge, information and belief, Barry Strickland & Company does not have any connection with the Debtor, creditors, any other party in interest, their respective attorneys or accountants, the United States Trustee, or any persons employed in the office of the United States Trustee, except that said accounting firm currently act or has acted as the Trustee's accountant on other occasions.

6. To the best of the Trustee's knowledge, information and belief, Barry Strickland & Company does not hold or represent any interest adverse to the bankruptcy estate and is a "disinterested person." Specifically, none of the members or associates of Barry Strickland & Company (a) is a creditor, an equity security holder, or an insider of the Debtor; (b) is, or was within 2 years before the date of the filing of the petition, a director, officer, or employee of the Debtor; and (c) has an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor, or for any other reason. A verified statement executed on behalf of Barry Strickland & Company in accordance with 11 U.S.C. § 327 and Fed. R. Bankr. P. 2014 is attached hereto.

7. It is in the best interest of the Debtor's estate, the creditors and parties in interest to authorize the employment of Barry Strickland & Company.

WHEREFORE, the Trustee respectfully requests the entry of an order authorizing the employment of Barry Strickland and Company, Certified Public Accountants as the Trustee's accountants in this case under the terms described herein, with compensation to be made only upon further order of this Court, and for such further relief as the Court deems just and proper.

Respectfully submitted,

H. JASON GOLD, TRUSTEE

By Counsel

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Counsel to the Chapter 7 Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of May 2024, the foregoing Application was served via CM/ECF to the parties registered to receive such notices, including:

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/s/ Dylan G. Trache
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